



UNITED STATES DEPARTMENT OF JUSTICE
CIVIL DIVISION

Signed and Filed: November 12, 2019

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

) Bankruptcy Case
) No. 19-30088 (DM)

) Chapter 11

) (Lead Case)

) (Jointly Administered)

) **ORDER ADDING THE UNITED STATES OF
) AMERICA AS PARTIES TO
) CONFIDENTIALITY AND PROTECTIVE
) ORDER [DOCKET NO. 3405] AS MODIFIED
) HEREIN**

) [No hearing requested]

1 The Court having considered the *Stipulation and Agreement for Order Adding the United States*
2 *of America as Parties to Confidentiality and Protective Order as Modified* (“**Stipulation and Agreement**
3 **for Order**”) entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
4 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the United States of America,
5 on behalf of the United States Department of Agriculture, United States Forest Service; the United States
6 Department of the Interior, Bureau of Land Management, Bureau of Indian Affairs, Fish and Wildlife
7 Service, and the National Park Service; the Small Business Administration, and the Department of
8 Homeland Security, Federal Emergency Management Agency (together, the “**U.S. Agencies**”), on the
9 other hand, filed on November __, 2019; and good cause appearing,

10 IT IS HEREBY ORDERED:

11 1. The U.S. Agencies shall be parties to the Confidentiality and Protective Order entered by
12 the United States Bankruptcy Court for the Northern District of California on August 7, 2019 in *In re*
13 *PG&E Corp., et al.*, Case No. 3:19-bk-30088 at Docket No. 3405 (the “**Order**”), as modified herein.

14 2. The Order is modified as follows.

15 A. Treatment of Protected Material by the United States. Nothing in the Order supersedes the U.S.
16 Agencies’ law enforcement, national security, or regulatory obligations regarding the disclosure
17 of information required by applicable federal law.

18 B. Freedom of Information Act Requests. The provisions of paragraph 8 of the Order shall apply to
19 requests made to the U.S. Agencies pursuant to the Freedom of Information Act, 5 U.S.C. § 552,
20 et seq.

21 C. Congressional Requests. The Order shall not prevent or limit the U.S. Agencies’ ability to provide
22 Protected Material to the United States Congress pursuant to a Congressional request. The United
23 States will use reasonable efforts to notify the Designating Party of such request if, and only if, the
24 requesting Congressional party does not object to such notification.

1 APPROVED AS TO FORM AND
2 CONTENT:

3 Dated: November 12, 2019

4 KELLER & BENVENUTTI LLP

5 /s/ Jane Kim

Jane Kim

6 *Attorneys for Debtors*
7 *and Debtors in Possession*

8 ***END OF ORDER***
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